

CHRISTOPHER CHIOU  
Acting United States Attorney  
District of Nevada  
Nevada Bar Number 14853  
HOLLY A. VANCE  
Assistant United States Attorney  
United States Attorney's Office  
400 S. Virginia Street, Suite 900  
Reno, NV 89501  
(775) 784-5438  
[Holly.A.Vance@usdoj.gov](mailto:Holly.A.Vance@usdoj.gov)

*Attorneys for Respondents*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

DANIEL LUCERO,	)	Case No. 2:21-cv-00915-RFB-VCF
	)	
Plaintiff,	)	
	)	<b>Stipulation and Order for Extension</b>
v.	)	<b>of Time</b>
	)	
ISABEL GUZMAN, ADMINISTRATOR,	)	<b>(First Request)</b>
SMALL BUSINESS ADMINISTRATION,	)	
	)	
Defendants.	)	
	)	
	)	

Defendants Isabel Guzman, Administrator, and Small Business Administration, (“Defendants”) and Plaintiff Daniel Lucero (“Plaintiff”) hereby stipulate and agree that Defendants may have a 21-day extension of time, from August 30, 2021 to September 20, 2021, to respond to Plaintiff’s complaint. This stipulation is brought pursuant to Federal Rule of Civil Procedure 6(b)(1)(A).

The process for obtaining records from Defendants has been considerably slowed because all employees at the facility where the records are located are teleworking due to the spread of COVID-19. Also, defense counsel’s brother recently suffered a life-threatening medical condition that required her to travel to New Hampshire, where he lives. Under the circumstances, good cause exists to extend the time for Defendants to respond to Plaintiff’s

1 complaint. *See* Fed. R. Civ. P. 6(b)(1)(A) (“When an act may or must be done within a  
2 specified time, the court may, *for good cause*, extend the time...with or without motion or  
3 notice if the court acts, or if a request is made, before the original time or its extension  
4 expires[.]”) (emphasis added).

5 This is Defendants’ first request for an extension of time. *See* LR IA 6-1(a) (must  
6 advise of previous extensions). Defense counsel contacted Plaintiff’s counsel regarding this  
7 extension request, and he has advised that he does not oppose the request. This stipulation  
8 is made in good faith and not for the purpose of undue delay.

9 Dated: August 30, 2021.

10 BLACK & WADHAMS

CHRISTOPHER CHIOU  
Acting United States Attorney

11  
12 /s/ Rusty Graf  
RUSTY GRAF  
13 Attorney for Plaintiff

/s/ Holly A. Vance  
HOLLY A. VANCE  
Assistant United States Attorney

14  
15  
16 **DATED:** 8-30-2021

**IT IS SO ORDERED:**

17   
18 Cam Ferenbach  
UNITED STATES MAGISTRATE JUDGE